

JAMES P. KEMP, ESQ.
Nevada Bar No. 006375
KEMP & KEMP
7435 West Azure Drive, Suite 110
Las Vegas, NV 89130
(702) 258-1183 / (702) 258-6983 Fax
jp@kemp-attorneys.com
Attorney for Plaintiff Diana Van Bree

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Diana Van Bree,

Plaintiff,

v.

Frank Kendall III, Secretary, United States
Air Force

Defendant.

Case No.: 2:22-cv-01038-MMD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE STIPULATED
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

[FIRST REQUEST]

THE PARTIES, by and through their undersigned parties hereby stipulate and request the court's approval to extend the time to file a proposed Stipulated Discovery Plan and Scheduling Order from the current due date of December 22, 2022 through and including **January 12, 2023**

The reason for this extension is so that the parties may continue to discuss the potential consolidation of this case with the *Van Bree vs. JT4, LLC* case, No. 2:20-cv-00788-RFB-VCF which involves similar legal and factual issues. If the cases are consolidated under FRCP 42 and LR 42-1 the need for a Discovery Plan and Scheduling Order in this case may become unnecessary. Additionally, Plaintiff's counsel is out of the country during the holiday season and will not return until January 4, 2023.

///

///

///

1 This stipulation to extend time to file a proposed Stipulated Discovery Plan and
2 Scheduling Order is sought for good cause and not for purposes of delay.

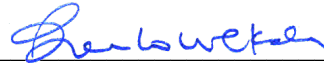
3 /s/ James P. Kemp

4 James P. Kemp, Esq.
KEMP & KEMP ATTORNEYS AT LAW
5 7435 West Azure Drive, Suite 110
Las Vegas, NV 89130
6 (702) 258-1183/ 258-6983 fax
7 Attorney for Plaintiff
Diana Van Bree

/s/ Skyler H. Pearson, Esq.

Jason M. Frierson, Esq.
United States Attorney
Skyler H. Pearson, Esq.
Assistant United States Attorney
District of Nevada
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336 /
Attorneys for Defendant
Frank Kendall III

10
11
12 IT IS SO ORDERED:

13 

14 UNITED STATES MAGISTRATE JUDGE

15 Dated: December 27, 2022
16
17
18
19
20
21
22
23
24
25
26
27
28